

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL NO. 2804

Civ. No. 1:17-md-02804-DAP

THIS DOCUMENT RELATES TO:  
*Track One Cases*

JUDGE POLSTER

**AMERISOURCEBERGEN CORPORATION AND  
AMERISOURCEBERGEN DRUG CORPORATION'S REVISED WITNESS LIST**

Pursuant to Federal Rule of Civil Procedure 26, and the Order Regarding Exhibit and Witness Lists (ECF No. 2695), Defendants AmerisourceBergen Drug Corporation ("ABDC") and AmerisourceBergen Corporation ("ABC") hereby disclose the following witnesses who may testify at trial on their behalf. ABDC and ABC also hereby incorporate by reference the Defendants' Joint Witness List and the Distributor Defendants' Joint Witness List.

ABDC and ABC specifically reserve the right to amend, supplement, or otherwise modify these disclosures if new or modified information is provided at any point. ABDC and ABC also reserve the right to supplement and/or to amend their lists with any witnesses identified on any party's witness lists, including any party who has settled or is severed or dismissed. ABDC and ABC further reserve the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. ABDC and ABC reserve the right to call any of these witnesses in their case in chief.

**A. Expert Witnesses**

1. Robert L. Buskey, Managing Director of BBG Consulting LLC

Areas of Testimony: Mr. Buskey is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

2. Thani Jambulingam, Ph.D., Professor, Arrupe Research Fellow, Pharmaceutical and Healthcare Marketing, Saint Joseph's University

Areas of Testimony: Dr. Jambulingam is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

**B. Fact Witnesses<sup>1</sup>**

1. Chris Zimmerman, Senior Vice President, Corporate Security and Regulatory Affairs, AmerisourceBergen Corporation

Areas of Testimony: Mr. Zimmerman is expected to testify concerning matters related to his duties and responsibilities as Senior Vice President, Corporate Security and Regulatory Affairs, and related to his previous relevant employment.

2. David May, Vice President, Corporate Security and Diversion Control, AmerisourceBergen Corporation

Areas of Testimony: Mr. May is expected to testify concerning matters related to his duties and responsibilities as Vice President, Corporate

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<sup>1</sup> Witnesses listed with an asterisk are witnesses for whom ABC and ABDC designated deposition testimony for trial.

Security and Diversion Control, and related to his previous relevant employment.

3. Steve Mays, Vice President, Regulatory Affairs, AmerisourceBergen Corporation  
Areas of Testimony: Mr. Mays is expected to testify concerning matters related to his duties and responsibilities as Vice President, Regulatory Affairs, and related to his previous relevant employment.
4. Marcelino Guerreiro, Diversion Control Analyst, AmerisourceBergen Corporation  
Areas of Testimony: Mr. Guerreiro is expected to testify concerning matters related to his duties and responsibilities as Analyst, Diversion Control, and related to his previous relevant employment.
5. Emily Coldren, Diversion Control Specialist, AmerisourceBergen Corporation  
Areas of Testimony: Ms. Coldren is expected to testify concerning matters related to her duties and responsibilities as Diversion Control Specialist, and related to her previous relevant employment.
6. Peter Cassady, Warehouse Manager, AmerisourceBergen Corporation  
Areas of Testimony: Mr. Cassady is expected to testify concerning matters related to his duties and responsibilities as Warehouse Manager, and related to his previous relevant employment.
7. Caroline Conneely, Managing Director, FTI Consulting Health Solutions  
Areas of Testimony: Ms. Conneely is expected to testify concerning matters related to her duties and responsibilities at FTI Consulting Health Solutions, as it relates to work performed for AmerisourceBergen Drug Corporation.
8. Elizabeth Garcia,\* former Corporate Investigator, AmerisourceBergen Corporation

Areas of Testimony: Ms. Garcia is expected to testify concerning matters related to her duties and responsibilities as former Corporate Investigator at AmerisourceBergen Drug Corporation.

Dated: October 5, 2019

**REED SMITH LLP**

/s/ Robert A. Nicholas

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Shannon E. McClure

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Corporation and AmerisourceBergen  
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**CERTIFICATE OF SERVICE**

I, Robert A. Nicholas, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Robert A. Nicholas  
Robert A. Nicholas